

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KYLE HOBBS

Defendant.

Criminal No.: 22-20243

Hon. Sean F. Cox  
United States District Judge

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**MOTION TO AMEND CONDITIONS OF RELEASE**

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Samuel James Bennett, attorney for Kyle Hobbs, respectfully requests that this Honorable Court grant his Motion to Amend Conditions of Release to allow interstate travel. In support of his motion, the Defendant states the following:

1. The Defendant is charged with one (1) count of Receipt of Child Pornography, in violation of 18 U.S.C. §2252A(a)(2).
2. That the Defendant has pled guilty to one (1) count of Receipt of Child Pornography pursuant to a Rule 11 Plea Agreement on July 13, 2022.
3. That the Defendant was placed under pretrial release supervision by the United States District Court, Eastern District of Michigan on July 7, 2021, and has been in full compliance with all terms and conditions of his Order of Release, including abiding by reporting requirements and GPS tether requirements.
4. The Defendant is currently set for Sentencing on Friday, December 2, 2022, at 2:30 p.m. before Your Honor.

5. That the Defendant wishes to travel to Mankato, Minnesota for the dates of November 18, 2022, through November 21, 2022, for the purpose of visiting his children, Charles Hobbs, age fourteen (14), and Benjamin Hobbs, age seven (7), along with his wife, Amber Hobbs, who has moved to Minnesota to stay with her parents.
6. That the Defendant will be reserving a hotel upon confirmation of approval for travel, should this Honorable Court allow grant the request to amend conditions of release.
7. That the Defendant will remain on GPS tether, provide Pretrial Services with all necessary information, and will check in with the local district as instructed, while subject to all other release conditions.

Respectfully Submitted,

SAMUEL J. BENNETT  
Attorney for Defendant

/s/Samuel Bennett

SAMUEL J. BENNETT  
Attorney for Defendant  
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(248) 281-6991

Dated: November 8, 2022

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**CERTIFICATE OF SERVICE**

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The undersigned certifies that the attached *Motion to Amend Conditions of Release*, was served upon the Court on November 8, 2022, via the ECF system which will send notification of such filing to opposing counsel. I declare under penalty of perjury that the above statement is true to the best of my information, knowledge, and belief.

Respectfully Submitted:

/s/Rebecca Lashbrook

Rebecca Lashbrook

Legal Assistant

Dated: November 8, 2022